

**UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF NORTH CAROLINA  
WESTERN DIVISION**

ANGIE KIELISZEWSKI, et al.,

Plaintiffs,

v.

Case No. 5:25-cv-00043

RELIAS LLC.,

Defendant.

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**CONSENT MOTION FOR EXTENSION OF TIME FOR DEFENDANT RELIAS LLC  
TO RESPOND TO FIRST AMENDED CLASS ACTION COMPLAINT**

Defendant Relias LLC (“Relias”), with the consent of Plaintiffs Angie Kieliszewski and LynnAnn Ware (“Plaintiffs”), and in accordance with Local Rule 6.1, respectfully moves for an extension of time until and including April 28, 2025, to move, plead, or otherwise respond to Plaintiffs’ claims in their First Amended Class Action Complaint (Dkt. 9) (the “Complaint”). The reasons in support of this Consent Motion are as follows:

1. Relias’s counsel received a copy of the First Amended Complaint from Plaintiffs’ counsel via email on February 24, 2025. The time for Relias to respond to the Complaint has not expired.

2. The undersigned counsel and Relias’s other attorneys (which will be filing notices of special appearance) have been newly retained and require additional time to evaluate and respond appropriately to the Complaint.

3. Plaintiffs’ counsel has consented to the requested extension of time. The Parties agree that the following schedule is appropriate:

04/28/2025 – Defendant’s deadline to answer or file a motion to dismiss.

05/28/2025 – Plaintiffs’ deadline to file opposition brief (if applicable).

06/18/2025 – Defendant’s deadline to file reply brief (if applicable).

4. This Consent Motion is submitted in good faith and is not intended to cause unnecessary delay and is not filed for any other improper purpose.

WHEREFORE, Defendant Relias respectfully moves for an extension of time until and including April 28, 2025, to move, plead, or otherwise respond to Plaintiffs’ Complaint.

Respectfully submitted,

CLARK HILL PLC

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Dated: February 28, 2025

### **CERTIFICATE OF SERVICE**

I hereby certify that on February 28, 2025, I electronically filed the above with the Clerk of Court using the CM/ECF System, which will provide electronic copies to counsel of record.

*s/ Christopher B. Clare*